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UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case,
No. 19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

**STATEMENT OF ADEL TURKI
REGARDING CRAVATH, SWAINE &
MOORE LLP'S CONTINUED
RETENTION AND EMPLOYMENT OF
COMPASS LEXECON, LLC AS
ECONOMIC CONSULTANTS**

(Re: Docket Nos. 1756 and 1842)

1 I, Dr. Adel Turki, being duly sworn, state the following under penalty of perjury:

2 1. I am a Senior Managing Director of Compass Lexecon, LLC ("Compass") a leading
3 economic consulting firm. Compass is currently the economic consultant to Cravath, Swaine &
4 Moore LLP ("Cravath"), lead coordinating counsel for all wildfire-related issues involving the
5 above-captioned debtors and debtors in possession (the "Debtors"). I am authorized to make this
6 declaration on behalf of Compass. Unless otherwise stated, I have personal knowledge of the facts
7 set forth herein.

8 2. I attended the hearing (the "Hearing") on May 22, 2019 to consider the *Debtors'*
9 *Application Pursuant to 11 U.S.C. § 327(a) and Fed. R. Bankr. P. 2014(a) and 2016 for Authority to*
10 *Retain and Employ Compass Lexecon, LLC as Economic Consultants to the Debtors Nunc Pro Tunc*
11 *to Petition Date* [Docket No. 1756] (the "Application"). I also reviewed all of the court filings made
12 by Compass's counsel, Togut, Segal & Segal LLP (the "Togut Firm"). At the Hearing, the Court
13 stated that consistent with (i) the statements filed by the Togut Firm and (ii) *Debtors' Supplemental*
14 *Statement Regarding Debtors' Application Pursuant to 11 U.S.C. § 327(a) and Fed. R. Bankr. P.*
15 *2014(a) and 2016 for Authority to Retain and Employ Compass Lexecon, LLC as Economic*
16 *Consultants to the Debtors Nunc Pro Tunc to Petition Date* [Docket No. 2072] (the "Debtors'
17 Statement," and together with the statements filed by the Togut Firm, the "Statements"), the
18 Debtors' may withdraw the Application and Compass can continue to be employed by Cravath. The
19 Court also asked that Compass file this statement confirming that Compass adopts the statements
20 made by the Togut Firm, and by Cravath in the Debtors' Statement and will agree to act in
21 accordance with the Statements.

22 3. I, on behalf of Compass, hereby adopt the representations of counsel set forth in the
23 Statements and agree to act consistently with the Statements.

24 4. Additionally, Compass shall provide reasonable notice to Cravath, the Debtors, and
25 the U.S. Trustee of any increase of the hourly rates listed in my declaration dated April 29, 2019 (the
26 "Turki Declaration") and my declaration dated May 3, 2019 (the "Supplemental Turki Declaration").

27 5. Compass shall conduct an ongoing review of its files to ensure that no conflicts or
28 other disqualifying circumstances exist or arise. To the extent that any new material facts or

1 relationships bearing on matters described in the Turki Declaration during the period of Compass's
2 retention by Cravath are discovered or arise, Compass will file a supplemental declaration.

3 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and
4 correct to the best of my knowledge and belief.

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6 Dated: May 28, 2019

7 /s/ Adel Turki

8 Adel Turki
9 Senior Managing Director
10 Compass Lexecon, LLC
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